



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

April 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

GUILLERMO ALEJANDRO FLORES,

Defendant.

No. 8:22-cr-00120-JVS

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii): Possession with
Intent to Distribute
Methamphetamine; 18 U.S.C.
§ 924(c)(1)(A)(i): Possession of a
Firearm in Furtherance of a Drug
Trafficking Crime; 18 U.S.C.
§ 922(k): Possession of a Firearm
Bearing an Obliterated Serial
Number; 21 U.S.C. § 853, 18 U.S.C.
§ 924, 28 U.S.C. § 2461(c): Criminal
Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about December 2, 2021, in Orange County, within the
Central District of California, defendant GUILLERMO ALEJANDRO FLORES
knowingly and intentionally possessed with intent to distribute at
least 50 grams, that is, approximately 60 grams, of methamphetamine,
a Schedule II controlled substance.

COUNT TWO

[18 U.S.C. § 924(c) (1) (A) (i)]

On or about December 2, 2021, in Orange County, within the Central District of California, defendant GUILLERMO ALEJANDRO FLORES knowingly possessed a firearm, namely, an Intratec, model AB-10, 9mm caliber pistol with an obliterated serial number, in furtherance of a drug trafficking crime, namely, possession with intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 841(a) (1), (b) (1) (A) (viii), as charged in Count One of this Indictment.

COUNT THREE

[18 U.S.C. § 922(k)]

On or about December 2, 2021, in Orange County, within the Central District of California, defendant GUILLERMO ALEJANDRO FLORES knowingly possessed a firearm, namely, an Intratec, model AB-10, 9mm caliber pistol, that had been shipped and transported in interstate commerce, from which defendant FLORES knew the manufacturer's serial number had been removed, obliterated, and altered.

FORFEITURE ALLEGATION ONE

[21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offense set forth in Count One of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

a) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense;

b) All right, title, and interest in any firearm or ammunition involved in or used in such offense, including but not limited to the following:

i. One Intratec, model AB-10, 9mm caliber pistol with an obliterated serial number; and

ii. 74 rounds of 9mm Luger caliber ammunition; and

c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be

1 located upon the exercise of due diligence; (b) has been transferred,
2 sold to, or deposited with a third party; (c) has been placed beyond
3 the jurisdiction of the Court; (d) has been substantially diminished
4 in value; or (e) has been commingled with other property that cannot
5 be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offenses set forth in Counts Two or Three of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

a) All right, title, and interest in any firearm or ammunition involved in or used in any such offense, including but not limited to the following:

i. One Intratec, model AB-10, 9mm caliber pistol with an obliterated serial number; and

ii. 74 rounds of 9mm Luger caliber ammunition; and

b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof

(a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been

substantially diminished in value; or (e) has been commingled with
other property that cannot be divided without difficulty.

A TRUE BILL

/s/

Foreperson

STEPHANIE S. CHRISTENSEN
Acting United States Attorney



SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

BENJAMIN R. BARRON
Assistant United States Attorney
Chief, Santa Ana Branch Office

JENNIFER L. WAIER
Assistant United States Attorney
Deputy Chief, Santa Ana Branch Office

ANN LUOTTO WOLF
Assistant United States Attorney
Santa Ana Branch Office